

ORIGINAL

SK:RCH/FJN  
F. #2016R01214

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF NEW YORK

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UNITED STATES OF AMERICA

- against -

HANAN OFER,

Defendant.

----- X

FILED  
IN CLERK'S OFFICE  
U.S. DISTRICT COURT E.D.N.Y.

★ SEP 13 2022 ★

BROOKLYN OFFICE

S U P E R S E D I N G  
I N F O R M A T I O N

Cr. No. 21-174 (S-1) (DG)(RER)  
(T. 31, U.S.C., §§ 5318, 5322(a) and  
5322(b); T. 18, U.S.C., §§ 2 and 3551 et  
seq.)

THE UNITED STATES ATTORNEY CHARGES:

FAILURE TO MAINTAIN AN EFFECTIVE ANTI-MONEY LAUNDERING PROGRAM

In or about and between November 2014 and June 2016, both dates being approximate and inclusive, within the Eastern District of New York and elsewhere, the defendant HANAN OFER, together with others, did willfully fail to establish, develop, implement and maintain an anti-money laundering ("AML") program at the New York State Employees Federal Credit Union – Credit Union Service Organization LLC ("NYSEFCU-CUSO") as required by law, to wit: OFER, among other things, failed to establish, develop, implement and maintain an effective AML program at the NYSEFCU-CUSO that was commensurate with the risks posed by the location and size of, and the nature and volume of the financial services provided by the NYSEFCU-CUSO; failed to develop internal policies, procedures and controls at the NYSEFCU-CUSO reasonably designed to assure compliance with the Bank Secrecy Act ("BSA"), including requirements for filing reports; failed to designate an appropriate person to assure day-to-day compliance with the NYSEFCU-CUSO AML program and the BSA, including assuring the NYSEFCU-CUSO properly filed reports; and failed to monitor, investigate, detect

and report suspicious transactions by, through or to the NYSEFCU-CUSO, as part of a pattern of any illegal activity involving more than \$100,000 in a 12-month period, contrary to Title 31, United States Code, Sections 5318(h), 5322(a) and 5322(b), and regulations issued thereunder, to wit: Title 31, Code of Federal Regulations, Section 1022.210.

(Title 31, United States Code, Sections 5318, 5322(a) and 5322(b); Title 18, United States Code, Sections 2 and 3551 et seq.)

BREON PEACE  
UNITED STATES ATTORNEY  
EASTERN DISTRICT OF NEW YORK

By: *Carolyn Pokorny*  
Assistant U.S. Attorney

*Deborah L. Connor*  
DEBORAH L. CONNOR  
CHIEF, MONEY LAUNDERING AND  
ASSET RECOVERY SECTION  
CRIMINAL DIVISION  
U.S. DEPARTMENT OF JUSTICE

F.#: 2016R01214  
FORM DBD-34  
JUN. 85

No. \_\_\_\_\_

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**UNITED STATES DISTRICT COURT**

EASTERN *District of* NEW YORK

CRIMINAL DIVISION

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THE UNITED STATES OF AMERICA

vs.

HANAN OFER,

Defendant.

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**SUPERSEDING INFORMATION**

(T. 31, U.S.C., §§ 5318, 5322(a) and 5322(b); T. 18, U.S.C., § 2 and 3551  
et seq.)

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*A true bill.*

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*Foreperson*

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*Filed in open court this* ----- *day,*

*of* ----- *A.D. 20* -----

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*Clerk*

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*Bail, \$* -----

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*Ryan C. Harris and Francisco J. Navarro, Assistant U.S. Attorneys (718) 254-7000*